

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS PAUL M. LION  
(OCA/USPS-T4-21-26)  
(July 24, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

*Gail Willette*

GAIL WILLETTE  
Director  
Office of the Consumer Advocate

*Shelley Dreifuss*

SHELLEY DREIFUSS  
Attorney



OCA/USPS-T4-21. Refer to LR-SSR-104, page 1, and USPS-T-7, footnote 15, at 23, concerning caller service. Please confirm that the "Facility Cost Mail Processing per Square Foot" was computed on the same basis as the average rental cost per square foot (see LR-SSR-99, at 5).

- a. If you do not confirm, please explain why the "Facility Cost Mail Processing per Square Foot" was not estimated on the same basis as the average rental cost per square foot for post office boxes.
- b. If you do not confirm, please provide for caller service the "Facility Cost Mail Processing per Square Foot" on the same basis as the average rental cost per square foot (see LR-SSR-99, at 5) computed for post office boxes by Delivery Group I-A, I-B, I-C, and Delivery Group II.

OCA/USPS-T4-22. Refer to page 34, lines 18-19, of your testimony concerning rents for floor space located in postal facilities. For postal facilities having lobby floor space, please confirm that the Postal Service pays or imputes the same rent for the lobby floor space and all other floor space in the same facility. If you do not confirm, please explain.

OCA/USPS-T4-23. Refer to LR-SSR-104, page 1, concerning caller service. Please define and distinguish between the following two key parameters: "Caller Numbers or Separations" and "Total Number of Firms or Callers".

OCA/USPS-T4-24. Refer to LR-SSR-104, page 1, concerning caller service.

- a. Please define and explain what constitutes "Large Firms" that are caller service customers.
- b. Please define and explain what constitutes "Small Firms" that are caller service customers.


OCA/USPS-T4-25. Refer to LR-SSR-104, Exhibit I on page 2, concerning caller service. Please confirm that the "Total" of \$67,221,780 represents the total attributable costs for caller service in the FY 96 test year, before rates.

- a. If you do not confirm, please explain and provide the total attributable costs for caller service in the FY 96 test year, before rates.
- b. In addition, please provide the total attributable costs for caller service in the FY 96 test year, after rates.

OCA/USPS-T4-26. Refer to LR-SSR-104, Exhibit I on page 2, and USPS-T1, WP D, at page 3. Please explain and reconcile the difference between the "Total" annual cost of \$67,221,780 for caller service in LR-SSR-104, Exhibit I, and the cost of caller service before rates of \$29,041,000 in WP D.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

  
SHELLEY DREIFUSS  
Attorney

Washington, D.C. 20268-0001  
July 24, 1996